

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE: AMARANTH NATURAL GAS  
COMMODITIES LITIGATION

MASTER FILE  
NO. 07-CV-6377 (SAS)

This Document Relates to: ALL ACTIONS  
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**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that upon the accompanying memorandum of law, the declaration of Christopher Lovell, Esq. and the Stipulation and Agreement of Settlement (“Settlement”), Plaintiffs, by and through their undersigned counsel, will respectfully move this Court, before the Honorable Shira A. Scheindlin, United States District Judge, at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York, on such day and at such time designated by the Court, for entry of the [Proposed] Scheduling Order that, among other things: (1) finds the Settlement to be sufficiently fair, reasonable, and adequate to warrant dissemination of notice to the Class; (2) certifies the Class for settlement purposes; (3) appoints Lovell Stewart Halebian Jacobson LLP, Lowey Dannenberg Cohen & Hart and Louis F. Burke P.C. as Class counsel; (4) finds the program of notice to be the best practicable notice under the circumstances; (5) approves the forms of the mailed and published notice of the Settlement; and (6) sets a schedule leading to the Court’s consideration of final approval of the Settlement, including the date, time and place for a hearing to consider the fairness, reasonableness and adequacy of the Settlement.

Dated: New York, New York  
December 27, 2011

Respectfully submitted,

/s/ Christopher Lovell

Christopher Lovell

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